

EXHIBIT E

1 Jason C. Murray (CA Bar No. 169806)
2 Robert B. McNary (CA Bar No. 253745)
3 CROWELL & MORING LLP
4 515 South Flower St., 40th Floor
5 Los Angeles, CA 90071
6 Telephone: 213-443-5582
7 Facsimile: 213-622-2690
8 Email: jmurray@crowell.com
9 rmcnary@crowell.com

6 Jerome A. Murphy (*pro hac vice*)
7 Astor H.L. Heaven (*pro hac vice*)
8 CROWELL & MORING LLP
9 1001 Pennsylvania Avenue, N.W.
10 Washington, D.C. 20004
11 Telephone: 202-624-2500
12 Facsimile: 202-628-5116
13 Email: jmurphy@crowell.com
14 aheaven@crowell.com

11 *Counsel for Plaintiff ViewSonic Corporation*

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

15 IN RE CATHODE RAY TUBE (CRT)
16 ANTITRUST LITIGATION

17 This Document Relates To:

18 *ViewSonic Corporation v. Chunghwa*
19 *Picture Tubes, Ltd., et al.*, Case No.
20 3:14-cv-02510

Master File No. 3:07-cv-05944-SC

MDL No. 1917

Individual Case No. 3:14-cv-02510

**PLAINTIFF VIEWSONIC
CORPORATION'S SUPPLEMENTAL
RESPONSES AND OBJECTIONS TO
DEFENDANTS CHUNGHWA PICTURE
TUBES, LTD. AND CHUNGHWA
PICTURE TUBES (MALAYSIA) SDN.
BHD.'S SECOND SET OF
INTERROGATORIES**

24 PROPOUNDING PARTY: Defendants Chunghwa Picture Tubes, Ltd. and Chunghwa Picture
25 Tubes (Malaysia) Sdn. Bhd.

26 RESPONDING PARTY: Plaintiff ViewSonic Corporation

27 SET NO.: TWO

28 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff ViewSonic

Corporation (“ViewSonic”) hereby further responds to the Second Set of Interrogatories to Plaintiff ViewSonic (“Interrogatories”) served by counsel for Defendants Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) Sdn. Bhd. (“Defendants”) in the above-captioned matter. ViewSonic reserves the right to supplement the objections and responses set forth below.

GENERAL OBJECTIONS

ViewSonic incorporates by reference its General Objections from its previous response to the Interrogatories.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 19:

Identify and describe any ownership interest(s) held in JEAN by You, including the amount of stock and ownership percentage, as well as any documents reflecting such ownership interest(s), for each year from January 1, 1995 through the present.

RESPONSE TO INTERROGATORY NO. 19:

ViewSonic refers to and incorporates its General Objections as though set forth fully herein. ViewSonic further objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome. ViewSonic further objects that this Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence because any ownership interests ViewSonic held in Jean are not relevant to the subject matter of this litigation. ViewSonic also objects to this Interrogatory on the grounds that it seeks information outside of the Relevant Period (as defined in ViewSonic’s Complaint). ViewSonic further objects to this Interrogatory on the grounds that the term “identify” and the phrase “documents reflecting” are vague, ambiguous, and overbroad. ViewSonic further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or work-product doctrine. ViewSonic further objects to this Interrogatory to the extent it seeks information that is in Defendants’ possession, custody, or control, or equally available to the defendants.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 19:

ViewSonic refers to and incorporates each of the General and Specific Objections identified in its initial Response to Interrogatory No. 19. Subject to and without waiving the foregoing objections, after a reasonable search and investigation, ViewSonic states that the table below reflects ViewSonic International Corporation's stock ownership in Jean during the Relevant Period:

| End of Year | Percentage Ownership | Number of Shares |
|-------------|----------------------|------------------|
| 1995 | 0% | 0 |
| 1996 | 0% | 0 |
| 1997 | 0% | 0 |
| 1998 | 0% | 0 |
| 1999 | 8% | 10,560,000 |
| 2000 | 4.9% | 7,184,320 |
| 2001 | 1% | 1,562,251 |
| 2002 | 0% | 0 |
| 2003 | 0% | 0 |
| 2004 | 0% | 0 |
| 2005 | 0% | 0 |
| 2006 | 0% | 0 |
| 2007 | 0% | 0 |

ViewSonic further states that ViewSonic International Corporation executed two stock purchase agreements for these shares in 1999. Discovery is ongoing and ViewSonic reserves the right to supplement and/or amend its response to this Interrogatory as appropriate

INTERROGATORY NO. 20:

Identify and describe any ownership interest(s) held in You by JEAN, including the amount of stock and ownership percentage, as well as any documents reflecting such ownership interest(s), for each year from January 1, 1995 through the present.

RESPONSE TO INTERROGATORY NO. 20:

ViewSonic refers to and incorporates its General Objections as though set forth fully herein. ViewSonic further objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome. ViewSonic further objects that this Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence because any ownership interests Jean held in ViewSonic are not relevant to the subject matter of this litigation. ViewSonic also objects to this Interrogatory on the grounds that it seeks information outside of the Relevant Period (as defined in ViewSonic's Complaint). ViewSonic further objects to this Interrogatory on the grounds that the term "identify" and the phrase "documents reflecting" are vague, ambiguous, and overbroad. ViewSonic further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or work-product doctrine. ViewSonic further objects to this Interrogatory to the extent it seeks information that is in Defendants' possession, custody, or control, or equally available to the defendants.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 20:

ViewSonic refers to and incorporates each of the General and Specific Objections identified in its initial Response to Interrogatory No. 20. Subject to and without waiving the foregoing objections, after a reasonable search and investigation, ViewSonic is unaware of any ownership interests that Jean held in ViewSonic during the Relevant Period. Discovery is ongoing and ViewSonic reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 21:

Identify and describe any management or control rights You have held in JEAN, including any documents reflecting such management or control rights, at any point during the time from January 1, 1995 through the present.

RESPONSE TO INTERROGATORY NO. 21:

ViewSonic refers to and incorporates its General Objections as though set forth fully herein. ViewSonic further objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome. ViewSonic further objects that this Interrogatory is not reasonably

1 calculated to lead to the discovery of admissible evidence because any management or control
 2 rights that ViewSonic held in Jean are not relevant to the subject matter of this litigation.
 3 ViewSonic also objects to this Interrogatory on the grounds that it seeks information outside of
 4 the Relevant Period (as defined in ViewSonic's Complaint). ViewSonic further objects to this
 5 Interrogatory on the grounds that the term "identify" and the phrase "documents reflecting" are
 6 vague, ambiguous, and overbroad. ViewSonic further objects to this Interrogatory to the extent
 7 that it is duplicative of other discovery propounded by other defendants in MDL No. 1917.
 8 ViewSonic further objects to this Interrogatory to the extent that it seeks information protected by
 9 the attorney-client privilege or work-product doctrine. ViewSonic further objects to this
 10 Interrogatory to the extent it seeks information that is in Defendants' possession, custody, or
 11 control, or equally available to the defendants.

12 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 21:**

13 ViewSonic refers to and incorporates each of the General and Specific Objections
 14 identified in its initial Response to Interrogatory No. 21. Subject to and without waiving the
 15 foregoing objections, ViewSonic states it did not have management or control rights in Jean
 16 during the Relevant Period. Discovery is ongoing and ViewSonic reserves the right to
 17 supplement and/or amend its response to this Interrogatory as appropriate.

18 **INTERROGATORY NO. 22:**

19 Identify and describe any investments of any kind made by You in JEAN, including any
 20 documents reflecting such investments, during the period from January 1, 1995 through the
 21 present.

22 **RESPONSE TO INTERROGATORY NO. 22:**

23 ViewSonic refers to and incorporates its General Objections as though set forth fully
 24 herein. ViewSonic further objects to this Interrogatory on the grounds that it is overbroad and
 25 unduly burdensome. ViewSonic further objects that this Interrogatory is not reasonably
 26 calculated to lead to the discovery of admissible evidence because any investments ViewSonic
 27 made in Jean are not relevant to the subject matter of this litigation. ViewSonic also objects to
 28 this Interrogatory on the grounds that it seeks information outside of the Relevant Period (as

defined in ViewSonic's Complaint). ViewSonic further objects to this Interrogatory on the grounds that the terms "identify" and "investments" and the phrase "documents reflecting" are vague, ambiguous, and overbroad. ViewSonic further objects to this Interrogatory to the extent that it is duplicative of other discovery propounded by other defendants in MDL No. 1917. ViewSonic further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or work-product doctrine. ViewSonic further objects to this Interrogatory to the extent it seeks information that is in Defendants' possession, custody, or control, or equally available to the defendants.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 22:

ViewSonic refers to and incorporates each of the General and Specific Objections identified in its initial Response to Interrogatory No. 22. Subject to and without waiving the foregoing objections, ViewSonic hereby refers to and incorporates its responses and objections to Interrogatory No. 19. Discovery is ongoing and ViewSonic reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 23:

Identify and describe any contracts between You and JEAN, including any contracts for stock ownership, as well as any documents reflecting such contracts, during the period from January 1, 1995 through the present.

RESPONSE TO INTERROGATORY NO. 23:

ViewSonic refers to and incorporates its General Objections as though set forth fully herein. ViewSonic further objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome. ViewSonic further objects that this Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence because each and every contract between ViewSonic and Jean is not relevant to the subject matter of this litigation. ViewSonic also objects to this Interrogatory on the grounds that it seeks information outside of the Relevant Period (as defined in ViewSonic's Complaint). ViewSonic further objects to this Interrogatory on the grounds that the term "identify" and the phrase "documents reflecting" are vague, ambiguous, and overbroad. ViewSonic further objects to this Interrogatory to the extent that it is duplicative

1 of other discovery propounded by other defendants in MDL No. 1917. ViewSonic further objects
 2 to this Interrogatory to the extent that it seeks information protected by the attorney-client
 3 privilege or work-product doctrine. ViewSonic further objects to this Interrogatory to the extent
 4 it seeks information that is in Defendants' possession, custody, or control, or equally available to
 5 the defendants.

6 Subject to and without waiving the foregoing objections, and pursuant to Rule 33(d) of the
 7 Federal Rules of Civil Procedure, ViewSonic refers Defendants to the transactional data produced
 8 in this litigation as VIEW_CRT00000001-VIEW_CRT00000002 and the contracts produced as
 9 VIEW_CRT00041343, VIEW_CRT00041337, VIEW_CRT00041328, VIEW_CRT00041327,
 10 VIEW_CRT00041325, VIEW_CRT00041322, VIEW_CRT00041317, VIEW_CRT00041221,
 11 VIEW_CRT00041214, VIEW_CRT00041208, and VIEW_CRT00041145. Discovery is ongoing
 12 and ViewSonic reserves the right to supplement and/or amend its response to this Interrogatory as
 13 appropriate.

14 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 23:**

15 ViewSonic refers to and incorporates each of the General and Specific Objections
 16 identified in its initial Response to Interrogatory No. 23. Subject to and without waiving the
 17 foregoing objections, ViewSonic hereby refers to and incorporates its responses and objections to
 18 Interrogatory No. 19. Discovery is ongoing and ViewSonic reserves the right to supplement
 19 and/or amend its response to this Interrogatory as appropriate.

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27

28

1 DATED: November 4, 2014

By: /s/ Astor H.L. Heaven

2 Jason C. Murray (CA Bar No. 169806)
3 Robert B. McNary (CA Bar No. 253745)
4 CROWELL & MORING LLP
5 515 South Flower St., 40th Floor
6 Los Angeles, CA 90071
7 Telephone: 213-443-5582
8 Facsimile: 213-622-2690
9 Email: jmurray@crowell.com
10 rmcnary@crowell.com

11 Jerome A. Murphy (*pro hac vice*)
12 Astor H.L. Heaven (*pro hac vice*)
13 CROWELL & MORING LLP
14 1001 Pennsylvania Avenue, N.W.
15 Washington, D.C. 20004
16 Telephone: 202-624-2500
17 Facsimile: 202-628-5116
18 Email: jmurphy@crowell.com
19 aheaven@crowell.com

20 *Counsel for Plaintiff ViewSonic Corporation*